



United States
Department of
Agriculture



Forest
Service

January, 2020

Decision Memo

Great Western Mining Corporation PLC Marietta T-4 West Exploration Drilling Project

Plan of Operations #02-19-01

Located on the

**Humboldt-Toiyabe National Forest,
Mineral County, Nevada**

Managed by the

USFS Bridgeport Ranger District, Bridgeport California



Overview of the Marietta T-4 West Exploration Drilling Project area, Mineral County, NV, looking to the northeast. The Project is located on the southern flank of the Excelsior Mountains. The northern portion of the Huntoon Valley is visible in the background. The existing improved access road visible in the foreground was bonded and utilized during an earlier exploration drilling project, and will be reclaimed as part of the reclamation requirements at the conclusion of exploration activities on the Marietta T-4 West Project.

INTRODUCTION

This Decision Memo (DM) documents the United States Forest Service (USFS) decision on the Marietta T-4 West Exploration Drilling Project (Project) proposal submitted by Great Western Mining Corporation PLC (GWMC) on December 6, 2018. The Project, assigned Plan of Operations number #02-19-01 (Plan), proposes to conduct mineral exploration drilling activities on National Forest System lands located in the Excelsior Mountains, Mineral County, Nevada.

LOCATION

The Project is located on the Bridgeport Ranger District at the southern margin of the Excelsior Mountains in Huntoon Valley, Mineral County, Nevada, approximately 65 miles southwest of Hawthorne, Nevada. Exploration activities would occur in all or portions of Section 36, Township 4 North, Range 31 East, Mount Diablo Base & Meridian (MDB&M). The location reference maps for the Project are the United States Geological Survey's (USGS) Huntoon Valley & Little Huntoon Valley 7.5-minute quadrangles. Access and general location for the project is shown on Figures 1 & 2.

There are no perennial streams, springs or ponds within the Project Area. Jack Springs Creek is situated approximately 2.3 miles southeast from the nearest proposed disturbance, and Huntoon Creek is located approximately 4.3 miles southwest from the nearest proposed disturbance.

UNITED STATES FOREST SERVICE MINERALS REGULATIONS AND POLICY

USFS policy in Title 36 Code of Federal Regulations Part 228 (36 CFR 228.1) states that use of the surface of National Forest System lands in connection with operations authorized by the United States mining laws (30 U.S.C. 21–54), which confer a statutory right to enter upon the public lands to search for minerals, shall be conducted so as to reasonably minimize adverse environmental impacts on National Forest System surface resources. While Federal law permits exploration and mining operations on National Forest lands; it also charges the agency with the prevention of unnecessary destruction of Forest lands and regulation of occupancy and use of the surface for purposes reasonably incident to prospecting, mining, or processing, primarily under the Organic Act of 1987 and the Multiple Use Mining Act of 1955.

Relevant policy in the Minerals and Geology Manual (FSM 2802) states that the Forest Service would:

- Encourage and facilitate the orderly exploration and development of mineral and energy resources on National Forest System lands to maintain a viable, healthy minerals industry, and
- Ensure that exploration, development, and production of mineral and energy resources are conducted in an environmentally sound manner.

PURPOSE AND NEED FOR THE PROPOSED ACTION

The agency's need is to respond to the proponent's submittal of a Plan of Operations (POO) and to ensure operations will be conducted so as to minimize adverse environmental impacts on National Forest surface resources (36 CFR 228.8, Subpart A) where feasible. The purpose of this proposed action is to authorize mineral exploration activities consistent with the statutory right of the proponent to explore for and develop mineral resources on federally-administered lands under the General Mining Law of 1872 and with other laws and regulations. The decision for the Forest Service to make is whether to approve the POO as submitted or to approve it with additional measures to protect surface resources. The proponent's need is to determine if economically viable mineral deposits exist within the proposed project area, and to define the nature, extent, shape, and economic value of such deposits. The Forest Service must process proposed mining

operations in a timely manner when they are submitted in accordance with regulations (36 CFR 228.4).

PROPOSED ACTION

The proposed action is for the Forest Service to authorize Great Western Mining Corporation to conduct mineral exploration for precious metals by drilling boreholes at up to six (6) proposed sites on lands managed by the Forest Service. Access to drill sites will utilize existing Forest Service system roads, existing non-system road, and an existing, temporary, previously-bonded constructed road. The project is expected to commence in the spring/summer of 2020 and will have a duration of one year. Work crews will stay in surrounding towns and commute daily to the Project Area.

GWMC will conduct exploration drilling with up to two (2) track-mounted reverse-circulation drill rigs. Boreholes will be drilled from six (6) constructed drill sites, with a maximum of two (2) holes drilled from the same drill pad. Holes are expected to average 1,000 feet in drilled depth, and may be vertical or angled. In order to minimize duration of the project, operations may be conducted 24 hours per day, 7 days per week. The duration of drilling at each designated drill site will vary depending on final hole depth, drilling conditions, road access conditions, and water availability.

Drill pads will measure approximately 90 ft in length by 30 ft in width, for an area of 2700 sq/ft per site. Within the disturbance area of each drill site, one sump measuring 20 ft (length) x 15 ft (width) x 10 ft (depth) will be excavated for the purpose of managing drill fluids and trapping drill cuttings. Each sump will be constructed with a ramp to allow egress by animals or humans.

Total surface resource disturbance for the project will consist of up to approximately 0.5 acres, including drill pads (0.4 acres) and an equipment laydown yard (0.1 acres). No new overland travel routes or constructed roads are proposed or necessary for the completion of this project.

Drilling operations will be managed to capture and control rock cuttings, prevent the discharge of drill cuttings and fluids into drainages or down-slope areas, and to keep work sites safe and clean. All drill holes will be plugged before the drill rig vacates the drill site so that only one hole will be open at any given time. All drill holes will be plugged as an operational procedure immediately after completion of drilling in accordance with Nevada Administrative Code (NAC) 534.4369, NAC 534.4371, NAC 534.4373, NAC 534.4375 and USFS standards.

Equipment required for the Project will include up to two track-mounted reverse-circulation drill rigs, two pipe trucks, one D-6 (or equivalent) bulldozer, up to two 2,000-3000 gallon all-terrain water vehicles, one backhoe, up to two portable light plant (including generators), up to two auxiliary air compressors, one ATV, two 1-ton trucks for transportation of drilling supplies to and from the project, and up to four 4WD pickup trucks for the transportation of Project personnel and drilling-associated materials, including fuel.

Specific measures designed to minimize adverse environmental impacts currently include, but are not limited to, the following:

- All equipment would be washed prior to entering the area to prevent the introduction of noxious weed seeds.
- Dust control will be accomplished by watering access routes as necessary.
- Cultural resources identified during a survey of the project area would be avoided by Project activities.
- If undiscovered archaeological or cultural resources are encountered during Project work, activity in that area would cease immediately, the Forest Service would be notified, and the

resources would be evaluated. The results of the evaluation would determine subsequent action.

- If ground disturbing activities occur during the avian breeding season (May 1st - July 15th), mitigation measures such as nest surveys by qualified biologists and buffer zones around active nests may, at the discretion of the District Wildlife Biologist, be implemented in order to reduce potential impact to migratory bird activity to the extent possible.
- Artificial lighting will be downward-directed in order to reduce light pollution, provide for public safety, enhance the visitor's "dark sky" experience, and reduce impacts to wildlife.
- Sumps will include escape ramps for wildlife and livestock.
- A maximum speed limit of 15 miles per hour will be maintained in the Project Area to reduce the potential for vehicle-wildlife related collisions.

Reclamation

Reclamation will be completed to the standards described in regulations 36 CFR 228.8(g). Overland travel routes will be ripped if they become overly compacted or rutted. All surface disturbance will be seeded with a Forest Service approved, weed-free seed mix at the appropriate time of year and at an application rate for optimum seed sprouting and plant growth. Seeding will be completed using a broadcast method and then raked. Reclaimed surfaces will be left in a textured, or rough, condition to enhance revegetation.

Seeded areas will be monitored for stability and revegetation success in accordance with the revegetation standards established in the Nevada Guidelines for Successful Revegetation for the Nevada Division of Environmental Protection, the Bureau of Land Management, and the USDA Forest Service, Attachment B (Instruction Memorandum #NV-13).

Duration

Surface disturbance activities resulting from this project, including reclamation earthwork, would be one year or less. Deviation from the approved reclamation design features that would result in ground disturbance would require a new Plan of Operations or further review and approval.

The complete Plan is included in the Project Record and is incorporated by reference.

DECISION

I have decided to approve exploration activities for the Marietta T-4 Exploration Drilling Project on the Humboldt-Toiyabe National Forest, as described above under the "Proposed Action" and further detailed in the Plan.

The action to authorize exploration activities is categorically excluded from documentation in an environmental impact statement (EIS) or an environmental assessment (EA) because the proposed action falls within category 8, short-term (one year or less) mineral, energy, or geophysical investigations and their incidental support activities that may require cross-country travel by vehicles and equipment, construction of less than one mile of low standard road (Service Level D, FSH 7709.56), or use and minor repair of existing roads (36 CFR 220.6(e)(8)). The total duration of exploration program implementation will not exceed one year from initiation of approved activities.

I find that there are no extraordinary circumstances that would warrant further analysis and documentation in an EA or EIS. I took into account resource conditions identified in agency procedures that should be considered in determining whether extraordinary circumstances might exist pursuant to 36 CFR 220.6[b]:

- **Federally listed threatened or endangered species or designated critical habitat, species proposed for Federal listing or proposed critical habitat, or Forest Service sensitive species.**

The Marietta T-4 West Exploration Drilling Project is to be conducted entirely within the boundaries of the disturbance area previously analyzed for the Marietta Target 4 Exploration Project (Decision Memorandum signed October 19, 2015). Proposed drill sites are located within existing road beds and previously utilized drill pads. Field surveys of the Project area by District wildlife and botany specialists in 2019 found no changes in vegetation communities or wildlife populations as were identified in the 2015 surveys.

A Wildlife Biological Evaluation (BE) of the Marietta Target 4 Exploration Project was completed by Enviroscientists, Inc., reviewed by Forest Service specialists, and approved on September 4, 2015. Potential habitats for two Forest Service Region 4 (R4) Sensitive wildlife species, one Humboldt-Toiyabe Management Indicator species, and three Bridgeport Ranger District (RD) Species of Interest occur within the Project Area. Of these, the presence of three migratory bird species, which are classified as Bridgeport RD Species of Interest, were confirmed within the Project Area by field surveys. The Wildlife BE concluded that the Project may affect potential habitats in the short term but will not cause populations to trend downward. Project activities during the May 1 through July 15 nesting season are prohibited unless measures are adopted to avoid nests identified during a pre-construction nest survey (Enviroscientists 2015b).

In addition, the Project Area has the potential to provide habitat for 22 Forest Service R4 Sensitive plant species. No R4 Sensitive plant species were observed within the Project Area during field surveys. Of the 22 R4 Sensitive plant species, the Botany BE concluded that Project activities may impact five R4 Sensitive plant species but are not likely to cause a trend toward federal listing or loss of viability. Although these species were not observed during field surveys conducted in 2015 and 2019, they may be present under optimal environmental conditions. The remaining 17 R4 Sensitive plants will not be impacted by Project activities (Enviroscientists 2015a).

[Enviroscientists, Inc. 2015A. Biological Evaluation for Threatened, Endangered, and Sensitive Botanical Species for Great Western Mining Company Target Four Exploration Project. Finalized July 9, 2015. Reno, Nevada. 32 pages.]

[Enviroscientists, Inc. 2015B. Biological Evaluation for Threatened, Endangered, and Sensitive Wildlife Species for Great Western Mining Company Target Four Exploration Project. Finalized September 9, 2015. Reno, Nevada. 41 pages.]

- **Floodplains, wetlands, or municipal watersheds.**
The project area is not within any municipal watersheds, or wetlands.
- **Congressionally designated areas such as wilderness, wilderness study areas, or National Recreation Areas.**
The project is not located within any Congressionally designated area.
- **Inventoried roadless areas or potential wilderness areas.**
Project activities are not proposed within an Inventoried Roadless or potential

wilderness area.

- **Research natural areas.**

The project is not located within or near any RNA.

- **American Indians and Alaska native religious or cultural sites.**

No American Indian religious or cultural sites in the project area were identified during the scoping and tribal consultation process.

- **Archaeological sites or historical properties or areas.**

A cultural resources survey report was prepared by ASM Affiliates in 2015 for the project area (Report R2014041702435). A second cultural resources inventory report was prepared by Bridgeport District Archaeologist Eric Dillingham in 2019 (Report R2019041702834). Effects on cultural resources were found to be temporary and minor. The Bridgeport Ranger District has determined that there will be no effect to historic properties as a result of this mineral exploration plan. SHPO concurred with the Forest Service determination by letter on August 16, 2019 (Undertaking #2019-6023) in determining a finding of **No Historic Properties Affected** for this undertaking.

In addition to the above, I have considered other elements of the analysis in my determination that there are no extraordinary circumstances as defined by the National Environmental Policy Act (NEPA), or other adverse effects associated with this project that will necessitate documentation in an EIS or EA. I have also considered the potential for cumulative effects and arrived at the conclusion that without notable direct or indirect effects, there will be no cumulative effects. My conclusion is based on (1) comments received during public involvement efforts and (2) the minimal environmental effects expected as a result of my decision.

The conclusions summarized in this document are based on a review of the project's record that reflects best available science and consideration of relevant scientific information and responsible opposing views where raised by internal or external sources. Further, the analysis reflects that management direction, findings, and conclusions are consistent with the Forest Plan.

PUBLIC INVOLVEMENT

Project information was entered in the Forest Service's Planning Appeals and Litigation System (PALS) database on July 25, 2019 and subsequently published to the Schedule of Proposed Actions (SOPA), which can be viewed by the public. A Scoping document requesting public comment was mailed out to interested individuals, organizations, and agencies on the District mailing list and uploaded to the Humboldt-Toiyabe National Forest web page for NEPA projects on August 2, 2019. A notice was sent by email to the Nevada Clearinghouse for state agencies on August 5, 2019. Comments on an earlier version of the Project (*Marietta T-4 Exploration Project, 2015*) were also considered in the project design and evaluation process.

Comments, inclusive of those received from both versions of the Project, were received from the Friends of Nevada Wilderness, Nevada Chapter of Backcountry Hunters and Anglers, Nevada State Historic Preservation Office, and Nevada Division of State Lands and State Land Use Planning Agency. Comments received from public and private organizations, individuals, and State Agencies during the scoping period were determined to have been directly or indirectly addressed in the Plan of Operations, specialist's reports, and/or the biological evaluation report.

Based on public comment, as the responsible official I have determined that no extraordinary circumstances exist pursuant to 36 CFR 220.6[b] that would warrant further analysis in an EA or EIS. Public comments may be viewed in the project record.

NATIVE AMERICAN CONSULTATION EFFORTS

In March, 2015, the Bridgeport Ranger District contacted tribes regarding the Marietta Target 4 Exploration Project, including the Bridgeport Indian Colony, Walker River Tribe, Yerington Paiute Tribe, and Washoe Tribe. The information package sent to the tribe included multiple projects. The District provided project information and requested any information related to traditional cultural properties, sacred locations or other sensitive sites related to the Marietta Target 4 Exploration Project. No tribes provided any information to the District on the Marietta Target 4 Exploration Project, though they replied on some other, unrelated projects included in the same package. The subsequent Marietta T-4 West Exploration Drilling Project does not vary substantially in its footprint from the original Marietta Target 4 Exploration Project, the majority of the ground surface is now previously disturbed, and travel routes are unchanged; and therefore the good faith effort the District conducted for the Marietta Target 4 Exploration Project is judged sufficient for the Marietta T-4 West Exploration Drilling Project.

FINDINGS REQUIRED BY OTHER LAWS AND REGULATIONS

This decision conforms to the Toiyabe National Forest Land and Resource Management Plan, as required by the National Forest Management Act of 1976, as amended. Applicable management plan standards include those for Minerals (p. IV-57 to 59), Soil and Water (p. IV-40 to 41), and Management Area Direction (p. IV-112 to 119). In addition, it is consistent with other laws, regulations, and policy, including the following:

- The Mining Act of 1872, as amended, 30 U.S.C. §§ 21-54 (1994), which confers a statutory right to enter upon the public lands to search for and mine minerals,
- 37 CFR 228 Subpart A-Locatable Minerals,
- FSM 2600 Wildlife, Fisheries, and Sensitive Plant Habitat Management; FSH 2609.13 Wildlife and Fisheries Program Management Handbook,
- Endangered Species Act,
- Migratory Bird Treaty Act,
- National Clean Water Act, as amended,
- Executive Order 11988 - Floodplain Management,
- Executive Order 12898 - Environmental Justice,
- National Historic Preservation Act and 36 CFR Part 800 – The Section 106 Process,
- Humboldt-Toiyabe FSM Supplement to Chapter 2080 – Noxious Weeds Management,
- FSM 7711 Transportation Analysis.

I find that this Decision is consistent with all other applicable Federal, State, and local laws or requirements.

DISCLAIMER

Approval of this Plan does not constitute recognition or certification of ownership by any person named as owner therein. Approval of this Plan does not constitute, now or in the future, recognition or certification of the validity of any mining claim to which it may relate or to the mineral character of the land on which it lies.

ADMINISTRATIVE REVIEW OPPORTUNITIES

This decision is not subject to appeal pursuant to the Agricultural Act of 2014 (Public Law No. 113-79, Section 8006) and the Consolidated Appropriations Act of 2014 (Public Law No. 113-76,

Section 431). In addition, this categorically excluded decision is not subject to the 36CFR218 pre-decisional objection process.

IMPLEMENTATION DATE

The proposed actions described in this decision may not be implemented until:

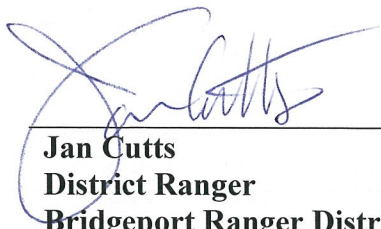
- The Forest Service has an approved reclamation bond posted by Great Western Mining Corporation PLC.
- Great Western Mining Corporation PLC has signed acceptance of, and the District Ranger has approved, the final Plan of Operations.
- Great Western Mining Corporation PLC has secured any other applicable state, local, and federal permits and authorizations.

RESPONSIBLE OFFICIAL

The responsible official for this project is Jan Cutts, District Ranger, Humboldt-Toiyabe National Forest, HC62, Box 1000, Bridgeport, CA 93517 or (760) 932-5801 or janette.cutts@usda.gov.

CONTACT

For further information regarding this project, please contact David Risley, Zone Geologist, Bridgeport & Carson Districts, at (760) 932-5821 or david.risley@usda.gov.



Jan Cutts
District Ranger
Bridgeport Ranger District
Humboldt-Toiyabe National Forest

1/8/2019
DATE

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GWMC Marietta T-4 West Exploration Drilling Project

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(1) mail: U.S. Department of Agriculture Office of the Assistant Secretary for Civil Rights 1400 Independence Avenue, SW Washington, D.C. 20250-9410; (2) fax: (202) 690-7442; or (3) email: program.intake@usda.gov.

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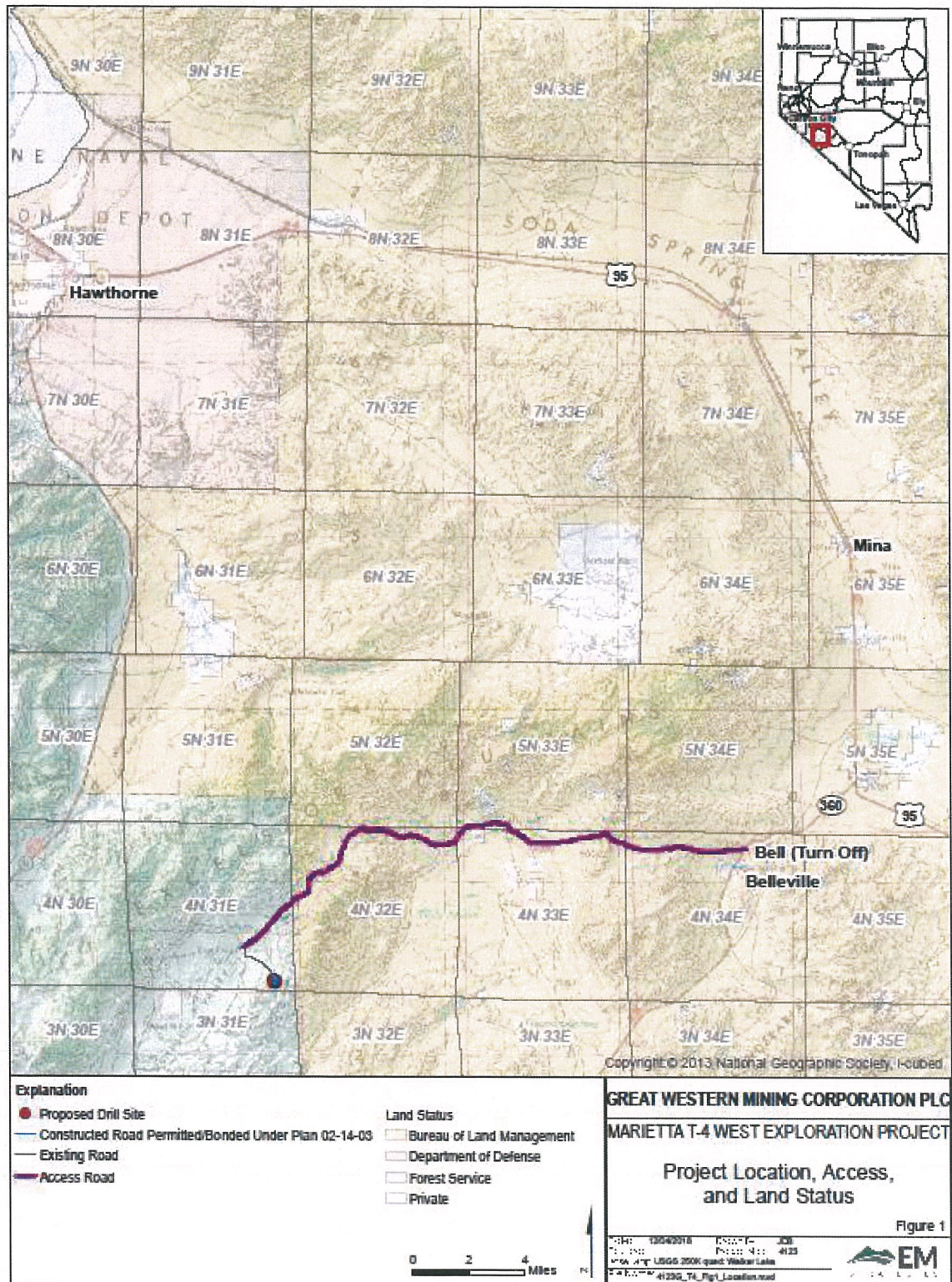


Figure 1. Marietta T-4 West Exploration Drilling Project – Location of Project Area on the southern flank of the Excelsior Mountains, Mineral County, Nevada, and Primary Access Route from State Routes 95 & 360.

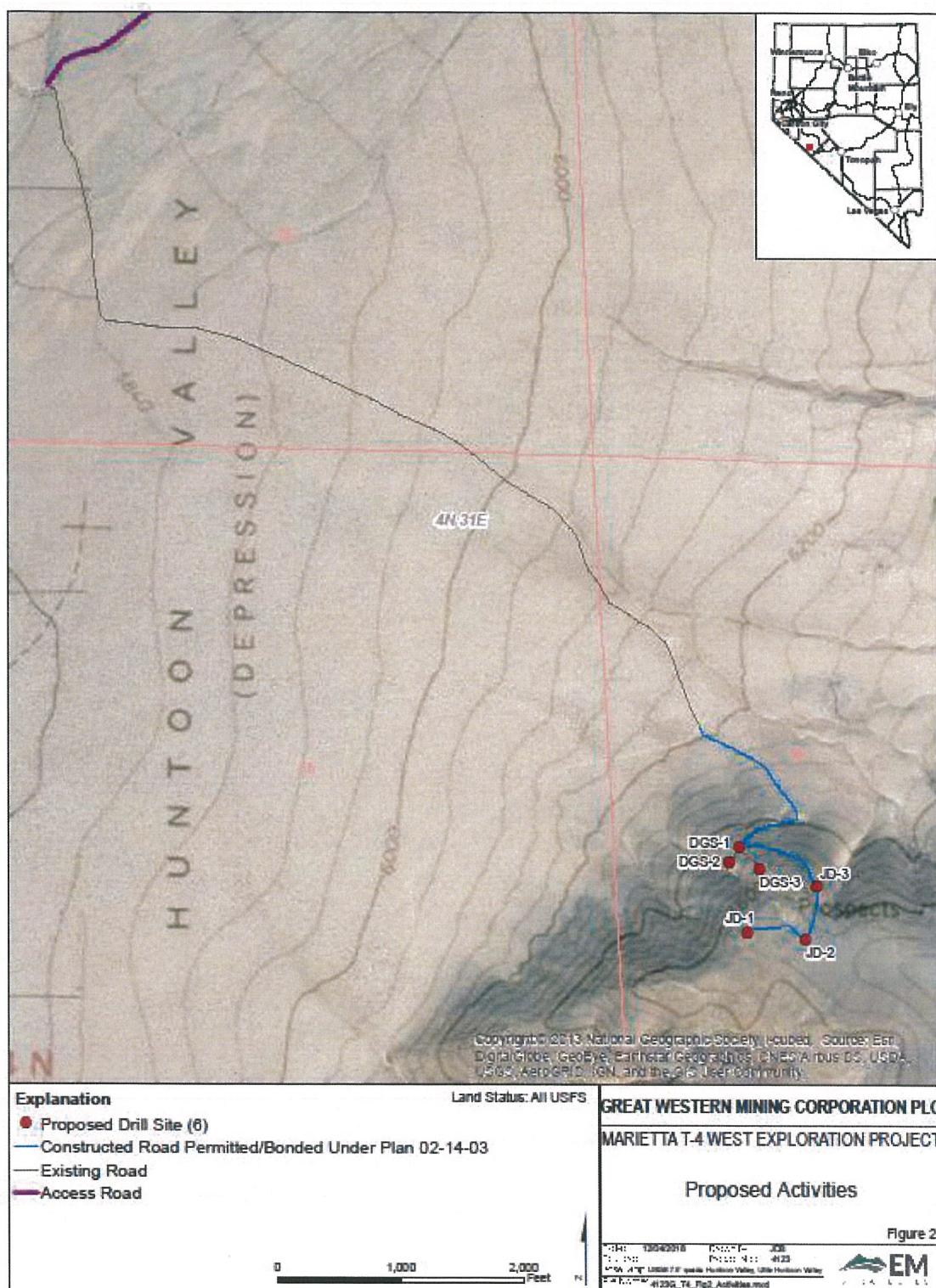


Figure 2. Marietta T-4 West Exploration Drilling Project – Proposed Drill Sites, Existing Forest Roads, and Constructed & Overland Travel Routes.